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October 27, 2016

BY ECF

Hon. Alvin K. Hellerstein
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: Jane Doe 1 v. City of New York, et al., 15-CV-3849 (AKH)

Your Honor:

We write in order to request a brief extension of the date by which one Rule 30(b)(6) deposition must be completed, from next Thursday, Nov. 3, 2016, to Monday, Nov. 21, 2016. *Plaintiffs do not object to this request.* This requested extension, if granted, would not affect any other dates in the Court's scheduling orders, including those for submission of both sides' expert witness reports. The reason for this request is that the undersigned will be out of the office all of next week for a previously scheduled vacation which includes non-refundable airline tickets and hotel reservations.

By order dated Oct. 16, 2016, governing the site inspection at the Rose M. Singer Center ("RMSC"), the Court ruled (among other things) that "[i]f plaintiff wishes to take a '30(b)(6)' deposition to document changes in duties and personnel between the shift during inspection and the night shift during the times alleged in the complaint, plaintiff may notice such a deposition, and take same, within two weeks following the site inspection" (Dkt. Entry 10/16). The inspection took place on Oct. 20, 2016, and five days later, on Oct. 25, plaintiffs noticed the Rule 30(b)(6) deposition, for Monday, Oct. 31, 2016.

However, the undersigned will be out of the office for a previously scheduled vacation that day and for the rest of next week, returning on Monday, Nov. 7, 2016. The parties have agreed, subject to Your Honor's approval, that objections to the notice, if any, will be asserted by Thursday, Nov. 10, and that the parties will work to resolve them before the deposition, or raise them with the Court at the earliest opportunity; and that the deposition will occur no later than Monday, Nov. 21, 2016. To the extent that plaintiffs' expert wishes to supplement his report,

*So ordered
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Al (c/tb)*

which is due on Nov. 4, 2016, he may do so, as long as the report is served on defense counsel by Dec. 2, 2016, which is one week prior to the due date for defendants' expert reports.

This is the first request for modification of any dates reflected in the Court's Oct. 16, 2016, docket order.

Respectfully submitted,

/s/

Arthur G. Larkin
Senior Counsel

AGL/m

cc: All Counsel (by ECF)